UNITED STATES DISTRICT COURT	
FOR THE SOUTHERN DISTRICT OF NEW	YORK

EVOLUTION CAPITAL MANAGEMENT, LLC, EVOLUTION CDC SPV LTD., GLOBAL OPPORTUNITIES FUND LTD., SPC, SEGREGATED PORTFOLIO M (f.k.a. "EVOLUTION MASTER FUND LTD., SPC, SEGREGATED PORTFOLIO M"), EVO CHINA 1:12-cv-04841-AJN

: OF ABSTENTION

: NOTICE OF PLAINTIFFS' : MOTION TO REMAND TO : STATE COURT BASED ON : LACK OF SUBJECT-MATTER : JURISDICTION OR, IN THE : ALTERNATIVE, PRINCIPLES

Plaintiffs,

v.

FUND and E1 FUND LTD.,

CDC SOFTWARE CORPORATION, WONG CHUNG KIU (a.k.a. "C.K. WONG"), YIP HAK YUNG (a.k.a. "PETER YIP"), ASIA PACIFIC ONLINE LIMITED (a.k.a. "ASIA PACIFIC ON-LINE LIMITED"), CH'IEN KUO FUNG (a.k.a. "RAYMOND CH'IEN"), FRANCIS KWOK-YU AU, DONALD L. NOVAJOSKY, MONISH BAHL, THOMAS M. BRITT III, WONG KWONG CHI (a.k.a. "SIMON WONG"), and WANG CHEUNG YUE (a.k.a. "FRED WANG"),

Defendants.

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion to Remand to State Court Based on Lack of Subject-Matter

Jurisdiction or, in the Alternative, Principles of Abstention, Plaintiffs, by and through their undersigned attorneys, will move before the Honorable Alison J. Nathan, United States District Judge at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 23B, New York, New York 10007, for a remand of this action to the Supreme Court of the State of New York, New York County and for such other and further relief as the Court deems just.

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Dated: July 12, 2012

New York, New York

By: /s/ Aaron M. Zeisler

Aaron M. Zeisler Nathan J. Berkebile

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Attorneys for Plaintiffs